

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Dynavair LLC,

Plaintiff

v.

Microchip Technology Incorporated,

Defendant.

Civil Action No. 2:16-cv-724 [JRG-RSP]

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT FOR PATENT INFRINGEMENT**

COMES NOW Defendant Microchip Technology Incorporated and hereby moves the Court to extend its deadline to answer or otherwise respond to Plaintiff's Complaint for Patent Infringement for thirty days, up to and including, October 28, 2016.

Good cause for this extension exists. Plaintiff's Complaint accuses a document called an application note (AN231) of infringing the asserted patent. Defendant Microchip Technology Incorporated has investigated the document to identify a potentially relevant family of products, and the investigation has revealed that Defendant stopped developing and supporting the entire family of products many years ago. Consequently, nearly all of the employees who have knowledge about the family of products are no longer with Defendant, making it very difficult for counsel to locate and obtain information needed to complete their investigation and determine Microchip's defenses to the complaint. Counsel for Microchip have been diligent in their investigation, but have been slowed by the unavailability of certain personnel. Nevertheless, counsel for Microchip have kept Dynavair's counsel informed of the situation, and thus, Dynavair consents to this requested extension.

The requested extension is not sought for purposes of delay, but so that justice may be done.

Dated: September 26, 2016

Respectfully submitted,

/s/ E. Glenn Thames, Jr.

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**ATTORNEYS FOR DEFENDANT
MICROCHIP TECHNOLOGY
INCORPORATED**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on September 26, 2016 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by U.S. first class mail.

/s/ E. Glenn Thames, Jr.

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